

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOSE ORTEGA, et al.,

Plaintiffs,

JOINT RULE 26(f) REPORT

-against-

UBER TECHNOLOGIES, INC., et al.,

15-CV-7387 (NGG) (JO)

Defendants.

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INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): May 22, 2017
2. Deadline for first request for production of documents and first request for interrogatories: June 30, 2017
 - 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) 0; defendant(s) 0
3. Date for completion of any joinder of additional parties and amendment of the pleadings: July 11, 2017
 - 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) 5; defendant(s) 0
4. Number of depositions by plaintiff(s) of: parties 5; non-parties 5
5. Number of depositions by defendant(s) of: parties 7; non-parties 3
6. Date of status conference (joint status report due two business days in advance: October 26, 2017
7. Date for completion of factual discovery: Class Certification Discovery: February 28, 2018; Merits Discovery: 120 days after ruling on motion for class certification.
8. Are expert witnesses needed? Yes X (trial only) No

- 8(a). Number of expert witness, if any, of plaintiff(s): medical 0; non-medical 0
- 8(b). Date for completion of those expert reports: 30 days after close of post-certification discovery.
- 8(c). Number of expert witnesses, if any, of defendant(s): medical 0; non-medical 2
- 8(d). Date for completion of those expert reports: 30 days after close of post-certification discovery.
- 8(e). Date for completion of rebuttal expert reports: 45 days after deadline for completion of expert reports.
9. Date for completion of expert discovery: 30 days after exchange of rebuttal expert reports.
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): TBD.
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: Motion for class certification: May 30, 2018.
12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions: Motion for summary judgment; motion to deny class certification: May 30, 2018.
13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes No X
14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes No X
15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. § 636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes No X